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June 10, 2004

Mr. Nabil S. Fayoumi
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
Monthly Report May 1 – May 31, 2004

Dear Mr. Fayoumi,

Enclosed is the Sauget Sites Area I Monthly Report for the May 2004 reporting period. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

Steven D. Smith

cc: Kevin Turner – USEPA
Tim Gouger - USACE
Sandra Bron - IEPA
Dave Webb - IDPH
Mike Coffey - USF&W
Richard Williams - Solutia
Cathleen Bumb - Solutia
Mayor Frank Bergman - Cahokia, IL
Village of Sauget - c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
L. Glen Kurowski - Monsanto

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Status Report

Date of Report: June 10, 2004
Period Covered: May 1, 2004 - May 31, 2004

Work Performed during the Reporting Period

Borrow Pit Lake

Sediment sampling in the Borrow Pit Lake commenced on May 6, 2003 and was completed on May 14, 2003. All sampling activities were observed on a full time basis by a USEPA oversight contractor. No deficiencies or problems were identified by the oversight personnel during the sampling. Samples were shipped to the analytical laboratories identified in the QAPP for analysis. Laboratory results were validated. The draft report was submitted to the Agency on September 2, 2003.

The BPL ecological assessment was conducted on October 20-22, 2003. EPA oversight was in attendance.

Dead Creek

Received U.S. EPA's comments for:

- *Dead Creek, Review of Responses to Comments and Proposed Action Plan*
- *Human Health Risk Assessment, Sauget Area One Site, Illinois.*

DNAPL Investigation

The final DNAPL Work Plan was submitted to the Agencies on April 20, 2004. The schedule for completion of the study was discussed at a meeting with the Agencies on April 20, 2004. At that meeting, it was agreed that field work for the investigation would begin during the week of May 7, 2004. It was also pointed out that the schedule contained in the approved Work Plan envisaged the investigation taking 6 months to complete. Thus, the June 23, 2004 completion date contained in the conditional approval letter could not be realized and an extension would almost certainly be necessary. In a letter dated May 3, 2004, a schedule extension to October 29, 2004 was requested, based on starting the investigation during the week of May 3, 2004. The USEPA has indicated

that it wants to see the investigation under way before considering any schedule extension.

Field work began on Task 2 of the Work Plan on May 10, 2004. This task required the surveying of approximately 57 existing wells for the presence of NAPL and, if detected, the sampling of any such material. Of the original 57 wells designated for inspection and survey, 54 were found to be usable. One well had been destroyed and two wells were damaged to the extend that downhole tools could not be used in the wells.

Non aqueous phase liquids were detected in three of the 54 wells, as follows:

- **EE-11**: This well, which is on the north side of Site G, was measured on May 17th and found to contain a dark brown LNAPL. The LNAPL appeared to a petroleum substance, based on color and odor. The initial depth to LNAPL was about 14.4 feet below top of casing, and the total depth of the well was measured at 23.1 feet below top of casing. Fluid levels in EE-11 were re-measured the following afternoon (May 20th) after the well was bailed down on May 19th, and at that time EE-11 was observed to have a layer of LNAPL approximately 0.2 feet thick. A total of approximately 1/4 cup of LNAPL (0.02 gallons) was removed from EE-11 during a NAPL recovery test on May 20th.

- **BR-G**: The bedrock well at Site G had some evidence of the presence of DNAPL. Dark brown spots and minor discontinuous brown staining were noted on the bottom 4 feet of a weighted cotton string lowered to the bottom of BR-G. A bailer lowered to the bottom of the well was found to have a light sheen or droplets on the surface when it was retrieved. No DNAPL was present within the bailer. A DNAPL recovery test was attempted at this location and over 5 gallons of fluids were pumped from the bottom of the well. Only water was recovered; no DNAPL was visible in the produced fluids.

- **BR-I**: The bedrock well at Site I also had some evidence of the presence of DNAPL. Dark brown spots and minor discontinuous staining were noted on the bottom 9 feet of a weighted cotton string lowered to the bottom of BR-I. A bailer lowered to the bottom of the well was found to have brown staining on the bailer surface when it was retrieved. Approximately 1/8 inch of DNAPL was observed in the bottom of the bailer. A DNAPL recovery test was attempted at this location and over 8 gallons of fluids were pumped from the bottom of the well. Only water was recovered; no DNAPL was visible in the produced fluids.

The well survey was completed on May 20, 2004.

Attachments

There are no Technical Memoranda or data submittals with this report.

Work Scheduled for Next Reporting Period

- Begin Task 3 (the geophysical survey) during the week of June 7, 2004.
- Finalize the schedule for Task 4 (installation of additional piezometers/wells). Originally, this task was scheduled to begin during the week of June 14th. However, the advisability of delaying the start of this activity until the preliminary interpretation of the geophysical data is available was discussed during a conference call with the Agencies on June 1st. This would allow the selection of new piezometers/well locations to be optimized. It was agreed that this possibility would be evaluated and a decision would be made during the first week of June.

Submittal Schedule Status

No other submittals are currently scheduled.